

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

Erin Wilson, on behalf of all )  
others similarly situated, )  
                                  )  
Plaintiff, )  
                                  )  
v. )                              CIVIL ACTION FILE  
                                  NO. 1:25-cv-03262-VMC  
Grocery Delivery E-Services )  
USA Inc. )  
                                  )  
                                  )  
Defendant. )  
                                  )  
\_\_\_\_\_)

**NOTICE OF WITHDRAWAL OF COUNSEL**

Pursuant to NDGa Local Rule 83.1(E)(4), counsel for Defendant Grocery Delivery E-Services USA Inc. (“Defendant”) hereby give notice of the withdrawal of Ari N. Rothman and Shahin O. Rothermel of Venable LLP. Defendant will continue to be represented by Michael A. Caplan and Jarred A. Klorfein of Caplan Cobb LLC, as well as Lauri A. Mazzuchetti, Whitney M. Smith, Damon W. Suden, and Frances V. McDonald of Kelley, Drye & Warren LLP.

Respectfully submitted, this 18th day of December, 2025.

[signatures on following page]

/s/ Ari N. Rothman

Ari N. Rothman (*pro hac vice*)  
Jane B. Baber (*pro hac vice*)  
**VENABLE LLP**  
600 Massachusetts Avenue, NW  
Washington, DC 20001  
Tel: (202) 344-4000  
Fax: (202) 344-8300  
[anrothman@venable.com](mailto:anrothman@venable.com)  
[jbaber@venable.com](mailto:jbaber@venable.com)

*Withdrawing Counsel*

/s/ Jarred A. Klorfein

Michael A. Caplan  
Georgia Bar No. 601039  
Jarred A. Klorfein  
Georgia Bar No. 562965  
**CAPLAN COBB LLC**  
75 Fourteenth Street, NE, Suite 2700  
Atlanta, Georgia 30309  
Tel: (404) 596-5600  
Fax: (404) 596-5604  
[mcaplan@caplancobb.com](mailto:mcaplan@caplancobb.com)  
[jklorfein@caplancobb.com](mailto:jklorfein@caplancobb.com)

Lauri A. Mazzuchetti

(*Pro hac vice pending*)  
Whitney M. Smith  
(*Pro hac vice pending*)

**KELLEY DRYE & WARREN LLP**

7 Giralta Farms, Suite 340  
Madison, NJ 07940  
Tel: (973) 503-5900  
Fax: (973) 503-5950  
[lmazzuchetti@kelleydrye.com](mailto:lmazzuchetti@kelleydrye.com)  
[wsmith@kelleydrye.com](mailto:wsmith@kelleydrye.com)

Damon W. Suden

(*Pro hac vice pending*)  
Frances V. McDonald  
(*Pro hac vice pending*)

**KELLEY DRYE & WARREN LLP**

3 World Trade Center  
175 Greenwich Street  
New York, NY 10007  
Tel: (212) 808-7800  
Fax: (212) 808-7897  
[dsuden@kelleydrye.com](mailto:dsuden@kelleydrye.com)  
[fmcdonald@kelleydrye.com](mailto:fmcdonald@kelleydrye.com)

*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of December, 2025, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court for the Northern District of Georgia, using the CM/ECF system, which will send a notification of such filing to all counsel of record.

*/s/ Jarred A. Klorfein*  
\_\_\_\_\_  
Jarred A. Klorfein  
Georgia Bar No. 562965

*Counsel for Defendants and  
Counterclaimant*